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June 24, 2013

VIA FEDEX

Mr. Lance Nixon, Enforcement Officer
Superfund Enforcement Assessment Section (6SF-TE)
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, Texas 75202-2733

Re: Wilcox Oil Superfund Site in Bristow, Creek County, OK— Response to CERCLA Section 104(e) Request

Dear Mr. Nixon:

Enclosed please find the Response to the CERCLA section 104(e) Request regarding the above-referenced site dated May 1, 2013 submitted on behalf of Chevron Corporation ("Chevron").

Chevron conducted a diligent search of its records, and the information responsive to the Request is attached hereto and labeled CHEV00001-00085. Chevron reserves the right to supplement its Response should it discover in the future any additional information responsive to the Request.

Please contact the undersigned should you have any questions or comments.

Sincerely,

Eve W. Barron
Senior Counsel

Enclosure

cc: Julie Lee

ENLOSURE 3

WILCOX OIL SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.

RESPONSE:

*Chevron Corporation
6001 Bollinger Canyon Rd.
San Ramon, CA 94583
Telephone: 925.842.1000*

2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.

RESPONSE:

*Eve W. Barron
Senior Counsel, Environmental & Safety Law Group
Chevron U.S.A. Inc.
1400 Smith Street, 5th Floor
Houston, TX 77002
Telephone: 713.372.9281
Fax: 713.372.9171*

*Kelly Avery
Legal Analyst, Environmental & Safety Law Group
1400 Smith Street, 5th Floor
Houston, TX 77002
Telephone: 713.372.1719
Fax: 713.372.9171*

3. If the respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, and fax number.

RESPONSE:

Please see Response to Question No. 2 above.

4. Identify any legal or equitable interest that you now have, or previously had in the Site. Include information regarding the nature of such interest; when, how, and from whom such interest was obtained; and when, how, and to whom such interest was conveyed. In addition, submit copies of all instruments evidencing the acquisition or conveyance of such interest.

RESPONSE:

Chevron found no information that is responsive to this question.

5. List all names under which your company or business has ever operated and has ever incorporated. For each name provide the following:

Whether the company or business continues to exist, indicate the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer operational, and provide documents detailing the transaction.

RESPONSE:

Chevron objects to this question as overly broad, burdensome and not relevant. Chevron further objects to this question to the extent that it seeks information that is publically available. Notwithstanding, but without waiving these objections, Chevron represents the company was incorporated under the name of Standard Oil Company of California ("SOCAL") on January 27, 1926. On July 1, 1984, SOCAL merged with Gulf Oil Corporation and became Chevron Corporation. On October 9, 2001 the merger between Texaco Inc. and Chevron Corporation was approved, and the company began doing business as ChevronTexaco Corporation that same day. On May 9, 2005, the company changed its name to Chevron Corporation.

6. Please identify the organizational relationship, if any between Chevron, Texaco, Texas Company, and Producers Oil.

RESPONSE:

Chevron objects to this question because the term "organizational relationship" is ambiguous, and the scope of the question is overly broad and burdensome to the extent that it seeks information from Chevron regarding corporate entities that have no connection to it. Without waiving these objections, Chevron states that Producers' Oil Company was incorporated on January 17, 1902. The Texas Company acquired 15,086 shares of Producers' Oil Company stock during the period from November 1902 to December 1906. In 1913, ten shareholders of The Texas Company formed the Industrial Securities Company, which acquired the stock of Producers' Oil Company. On July 1, 1913, Producers' Oil Company and The Texas Company entered into an Operating Agreement in connection with oil and gas leases located in Texas, Louisiana and Oklahoma. On July 2, 1917, the stock of Producers' Oil Company held by the Industrial Securities Company was acquired by The Texas Company. In late 1917, all properties and assets of Producers' Oil Company were transferred to The Texas Company, and Producers' Oil Company was dissolved on November 23, 1917.

Information responsive to this question is attached hereto.

7. During the ownership period of approximately 1929-1937, what were the business operations at the Site?

RESPONSE:

Chevron found no information that is responsive to this question.

8. During the time of ownership, did Producers Oil operate an oil refinery?
What products were produced?
What was the volume of production?

RESPONSE:

Chevron found no information that is responsive to this question.

9. Please provide the names of any other entities that shared an interest in the refinery during Producers Oil's ownership of the real property. Provide also the supporting documentation.

RESPONSE:

Chevron found no information that is responsive to this question.

10. Please provide the names of any other entities that operated at the Site during Producers Oil's ownership. Provide also the supporting documentation.

RESPONSE:

Chevron found no information that is responsive to this question.

11. What, if any, relationship was there between Producers Oil and the following entities:
Bristow Oil and Refinery, Lorraine Refining, Interocean Oil Company, Continental Oil Company, Bolin Oil, Wilcox Oil Company and Texaco?

RESPONSE:

Other than the information provided in Response to Question No. 6, Chevron found no information that is responsive to this question.

12. If any of the documents solicited in this information request are no longer available, please indicate the why they are no longer available.

RESPONSE:

Chevron does not have reason to believe at this time that any documents solicited in this information request are no longer available.